

LAW OFFICES OF
MADELYN SPATT SHULMAN P.C.
3000 MARCUS AVENUE
SUITE 1E5
LAKE SUCCESS, NY 11042-1004

TEL: (516) 942-5100
FAX: (516) 437-6434
EMAIL: MSSPC@OPTONLINE.NET

June 5, 2015

VIA ECF

Honorable Louis L. Stanton
United States District Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street, Room 1920
New York, NY 10007-1312

Re: *Klauber Brothers, Inc. vs. Americlo Couture, Inc., Jeffrey Luo and Michael Kin Soon Leong, et al.*, Case No.: 15-CV-00874 (LLS)(AJP)

Dear Judge Stanton:

We are counsel for Defendant Michael Kin Soon Leong ("Defendant Leong").


Defendant Leong requests an enlargement of time, up to and including June 26, 2015 for Defendant Leong to answer, move or otherwise respond to Plaintiff's Complaint dated February 5, 2015 ("Complaint"). Defendant Leong's answer or other response is currently due on June 15, 2015. Plaintiff consents to this request.

One previous request for an enlargement of time to answer, move or otherwise respond with respect to the Complaint was made by Defendant Leong before this Court.

Plaintiff and Defendant Leong are currently engaged in settlement discussions. The reason for this request for an additional extension is to permit Plaintiff and Defendant Leong to finalize a settlement and settlement agreement prior to the June 26, 2015 Scheduling Conference.

This letter-motion is made in good faith and will not prejudice Plaintiff.

Respectfully submitted,



Madelyn Spatt Shulman

cc: via electronic transmission
Philip Howard Gottfried, Esq.

Hon. Louis L. Stanton
May 11, 2015
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Counsel for Plaintiff Klauber Brothers, Inc.

Frank A. Mazzeo, Esq.
Counsel for Defendants Americlo Couture, Inc. and Jeffrey Luo